

Exhibit 16

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JOAQUIN Q. ATALIG

**IN THE SUPERIOR COURT
OF THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

JOAQUIN Q. ATALIG,)	CIVIL CASE NO. 06-0119(R)
)	
)	
Plaintiff,)	
)	
vs.)	ANSWER TO COUNTERCLAIM
)	ASSERTED BY BRIAN M. CHEN
OKP (CNMI) CORPORATION,)	
BRIAN M. CHEN, PRASADA REDDY)	
GOLUGURI, PRAMUAN)	
JAIPHAKDEE, WILAI PROMCHAI,)	
COMMONWEALTH PORTS)	
AUTHORITY, and REGINO M. CELIS,)	
in his capacity as Acting Executive)	
Director of the Commonwealth Ports)	
Authority, and DOES 1-3,)	
)	
Defendants.)	
)	

COMES NOW Joaquin Q. Atalig, and in answer to the Counterclaim asserted by Brian M. Chen, states as follows:

1. Counter-defendant admits the allegations contained in paragraphs 1, 2, 3 and 4 of the Counterclaim.
2. With regard to paragraphs 5, 6, 7 and 8, these paragraphs assert legal conclusions and legal arguments and on that basis are denied. To the extent documents are quoted in these paragraphs, the documents speak for themselves. The Second Amended Complaint speaks for itself as to what has been alleged.
3. Counter-defendant denies the allegations made in paragraphs 9 and 10.
4. Counter-defendant denies that Counter-plaintiff is entitled to the relief paid for in the Counterclaim.

AFFIRMATIVE DEFENSE

For his Affirmative Defenses, Counter-defendant asserts:

- a. Counter-plaintiff has unclean hands.
- b. Counter-plaintiff has failed to mitigate damages.

c. Counter-defendant asserts that the causes of action and factual assertions made in the underlying Second Amended Complaint preclude an award to Counter-defendant on the Counterclaim.

JURY DEMAND

Plaintiff hereby demands a jury trial on the Counterclaim.

Dated: May 29, 2007

Respectfully submitted,

O'CONNOR BERMAN DOTT & BANES

By: _____/s/
Michael W. Dotts, Esq.